

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

JUDITH THOMAS

*on her own behalf and on behalf of
all others similarly situated,*

Plaintiffs,

v.

SUNSHINE FINANCIAL GROUP, LLC

and

LAW OFFICE OF J. SCOTT MORSE, LLC
D/B/A THE DEBT RECOVERY LAW CENTER

Defendants.

Case No. 1:11-cv-01367-BEL

**CONSENT MOTION REQUESTING LEAVE TO FILE
AMENDED CLASS ACTION COMPLAINT**

Plaintiff Judith Thomas, by and through her attorney and pursuant of FED. R. CIV. P. 15, hereby moves this Court for leave to amend her original Class Action Complaint. For support, Plaintiff states:

1. Plaintiff filed a Class Action Complaint and Prayer for Jury Trial on May 20, 2011 with this Court. Docket #1.

2. The Class Action Complaint alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et. seq.*, the Maryland Consumer Debt Collection Act, Md. Code Ann., Comm. Law § 14-201 *et seq.*, the Maryland Consumer Protection Act, Md. Code Ann., Comm. Law § 13-101 *et seq.* and Maryland common law against two Defendants Sunshine

Financial Group, LLC and Law Office of J. Scott Morse, LLC d/b/a The Debt Recovery Law Center.

3. Neither Defendant has filed an Answer to the original Class Action Complaint and Prayer for Jury Trial.

4. The purpose of the Amended Class Action Complaint is to expand the scope of the Class and to add allegations against each Defendant regarding Sunshine Financial Group, LLC's alleged failure to obtain a debt collection license in Maryland.

5. At the request of all parties, this Court stayed all further proceedings in the case pending a settlement conference scheduled for January 19, 2011 with Chief Magistrate Judge Paul W. Grimm. ECF #9, 11 and 12.

6. The parties still wish to keep the stay in place and to proceed to the settlement conference. Nonetheless, Plaintiff is requesting that the Court lift the stay solely for the purpose of allowing Plaintiff to file the attached Amended Class Action Complaint.

7. FED. R. CIV. P. 15(a)(2) allows a party to amend a pleading with consent from the opposing party.

8. In accordance with LOCAL RULE 103.6(d) and FED. R. CIV. P. 15(a)(2), Plaintiff requested consent from Sunshine Financial Group, LLC and Law Office of J. Scott Morse, LLC d/b/a The Debt Recovery Law Center and both parties consented to the filing of this Motion in writing.

9. Plaintiff has not previously filed any amended pleadings in this action.

10. Pursuant to this Court's LOCAL RULES, both a clean version (**Exhibit A**) and a redlined version (**Exhibit B**) of the Amended Class Action Complaint are attached hereto.

For the reasons set forth herein, Plaintiff requests that the Consent Motion Requesting Leave to File Amended Class Action Complaint be GRANTED, that the Court lift the stay in this case temporarily and solely for the purpose of accepting the filing of the Amended Class Action Complaint and that **Exhibit A** be accepted for filing.

Respectfully submitted,

Z LAW, LLC

Dated: July 28, 2011

/s/ 28191

Cory L. Zajdel, Esq. (Fed. Bar. No. 28191)
10811 Red Run Blvd., Ste. 204
Owings Mills, MD 21117
(443) 213-1977
clz@zlawmaryland.com

Attorney for Plaintiff